

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
vs.)	
)	NO. 1:17-cv-2989-AT
BRAD RAFFENSPERGER, et al.,)	
)	
Defendant.)	
)	

NOTICE OF JOINT PROPOSED SCHEDULE

Pursuant to agreement reached and as set forth at the Scheduling Conference before this Court on May 31, 2019, Plaintiffs and Defendants hereby jointly propose the following schedule in the above-referenced matter.¹

Case Event	Date
Answers to the Second Amended and Third Amended Complaints	June 4, 2019
26(f) Conference	June 10, 2019
Submission of Joint Discovery Plan	June 17, 2019

¹ This schedule does not include the Court's Order scheduling briefing and hearing for Curling Plaintiffs' Preliminary Injunction Motion and Coalition Plaintiffs' anticipated Preliminary Injunction Motion.

Close of Fact Discovery	November 15, 2019
Opening Expert Reports ²	November 22, 2019
Rebuttal Expert Reports	December 4, 2019
Reply Expert Reports (if any)	December 11, 2019
Trial Readiness	January 2020

Fact Discovery

The parties have agreed to the following parameters on fact discovery:

- All written responses and objections to discovery requests (interrogatories, requests for production, requests for admissions, and deposition notices pursuant to Federal Rule of Civil Procedure 30(b)(6)) between the parties shall be due within fifteen calendar days of service of any such request. Production of documents in response to such discovery requests shall be due within thirty calendar days. When necessary, document production may be provided on a rolling basis beginning the thirtieth calendar day.
- All discovery requests and responses, between the parties, including objections, shall be served electronically (e.g., by email and file sharing methods) unless doing so is infeasible (e.g., due to volume), and such service shall constitute formal service. Such electronic service shall be made on each party's designated points of contact identified in **Exhibit A**. For purposes of calculating time for responses/objections and productions, discovery requests served after 6 p.m. eastern time shall be considered served the next business day. Responses may be electronically served at any time prior to the end of the last calendar day.

² Opening expert reports are due for any particular issue on which a party bears the burden of proof.

- Each side (i.e., Plaintiffs, collectively, and Defendants, collectively) will be permitted twenty fact witness depositions (including any third-party fact witnesses). Should a party issue a notice of deposition pursuant to Federal Rule of Civil Procedure 30(b)(6), said deposition will only be considered one deposition regardless of the number of individuals designated by the Rule 30(b)(6) deponent for that particular deposition.
- Any response to third-party subpoenas issued to any county, municipality, or election officials thereof, prior to May 31, 2019, will be due upon June 17, 2019. This limitation does not foreclose, or alter responses to, the submission of any requests pursuant to Georgia's Open Records Act. However, parties are advised that O.C.G.A. § 50-18-71(e) requires that any Open Records Act requests issued to the parties must also copy counsel of record.